

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No.: 1:22-CR-20306-DPG-2**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**LUIS FERNANDO VUTEFF,**

**Defendant.**

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**DEFENDANT'S UNOPPOSED MOTION  
FOR PERMISSION TO BRIEFLY BE PRESENT AT  
THE MIAMI INTERNATIONAL AIRPORT**

Defendant, **LUIS FERNANDO VUTEFFF** (“**Mr. Vuteff**”), by and through undersigned counsel, hereby files this Unopposed Motion to Briefly be Present at the Miami International Airport, and as grounds therefore, states as follows:

1. On May 1, 2024, Mr. Vuteff was charged by Superseding Information with one (1) count of conspiracy to engage in monetary transactions in property derived from a specified unlawful activity, in violation of 18 U.S.C. §§ 1956(h) and 1957(a) (Count 1). (D.E. 141).

2. On May 14, 2024, Mr. Vuteff pled guilty to Count 1 of the Superseding Information. (D.E. 145).

3. On December 17, 2024, the Court sentenced Mr. Vuteff to, inter alia, thirty (30) months of incarceration and two (2) years of supervised release. (D.E. 185). In addition, the Court has permitted Mr. Vuteff to self-surrender at the institution designated by the Bureau of Prisons on or before June 20, 2025. (D.E. 185).

4. Mr. Vuteff has been on pretrial release with special conditions since September 30, 2022. (D.E.s 26, 48, and 49). As special conditions of his pretrial release, Mr. Vuteff is: (1) prohibited

from visiting any commercial transportation establishments, including airports; (2) must abide by a daily curfew; and (3) is subject to location monitoring by the U.S. Probation Office for the Southern District of Florida. (D.E.s 26, 48, and 49).

5. On January 28, 2025, Mr. Vuteff's fourteen-year-old son, B.V., traveled from Buenos Aires, Argentina to Miami, Florida to visit Mr. Vuteff in-person. B.V. is scheduled to depart from Miami International Airport to Buenos Aires, Argentina on February 25, 2025, on Argentina Airlines Flight No. AR 1302 at 8:15 A.M.

6. Mr. Vuteff respectfully requests that the Court permit him to briefly be present at the Miami International Airport on February 25, 2025, solely for the purpose of assisting B.V. with checking into his (B.V.'s) flight at the airport and ensuring that B.V. is safely "handed off" to an Argentina Airlines employee who will accompany B.V. on his return flight to Argentina.

7. Should the Court grant this request, Mr. Vuteff would arrive at Miami International Airport with B.V. on February 25, 2025 at 5:15 A.M., accompany B.V. to the Argentina Airlines check-in counter, complete B.V.'s check-in process, and then leave Miami International Airport shortly thereafter. Mr. Vuteff will not pass through airport security or accompany his son to the flight's departure gate.

8. To date, Mr. Vuteff has faithfully abided by all of his pretrial release requirements without a single violation in any way.

9. In addition, Mr. Vuteff's passports (along with those of his spouse and two other minor children) have been in the possession of the U.S. Probation Office for the Southern District of Florida since October 2022.

**LOCAL RULE 88.9(a) CERTIFICATION**

10. Undersigned counsel has conferred with Department of Justice Trial Attorney Paul Hayden, who advised the Government has **no objection** to the relief requested herein.

11. Undersigned counsel has also conferred with United States Probation Officer Juan Lora, who advised that the United States Probation Office has **no objection** to the relief requested herein.

**WHEREFORE**, Defendant, **LUIS FERNANDO VUTEFF**, respectfully requests this Court grant his Unopposed Motion for Permission to Briefly be Present at the Miami International Airport, and such other relief as is just and proper.

Respectfully submitted,

**GRAYROBINSON, P.A.**  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on February 19, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/Brian H. Bieber  
BRIAN H. BIEBER

s/Alek Ubieta  
ALEK UBIETA